

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Consider the
Adoption of a General Order and Procedures to
Implement the Digital Infrastructure and Video
Competition Act of 2006.

R.06-10-005
(Filed October 5, 2006)

**REPLY COMMENTS OF
AT&T CALIFORNIA ON
DRAFT OPINION RESOLVING ISSUES IN PHASE II
(FILED 8/24/07)**

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AT&T California, pursuant to Rule of Practice and Procedure 14.3 of the California Public Utilities Commission (“Commission”), provides the following reply comments on the **Draft Opinion Resolving Issues In Phase II (Filed 8/24/07)** (hereinafter, “Proposed Decision” or “PD”).

I. INTRODUCTION

The Opening Comments of The Utility Reform Network (“TURN”), the California Community Technology Policy Group (“CCTPG”)/Latino Issues Forum (“LIF”) (collectively, “CCTPG/LIF”), and Greenlining demonstrate once again that when the Commission departs from the language of the Digital Infrastructure and Video Competition Act of 2006 (“DIVCA” or “the Act”), and begins to impose requirements that might merely be “useful,” there is no end to the requirements that will be dreamt up—or the creativity of the attempts to justify them. Indeed, as discussed below, some parties have attempted to justify burdensome and intrusive reporting requirements based merely on a *definition* contained within DIVCA.

These efforts would send the Commission further down the slippery and counter-productive regulatory slope. In DIVCA, the Legislature expressly recognized that competition, not regulation, would drive positive change in the video services market¹ and decreed,

Neither the commission nor any local franchising entity or other local entity of the state may ... *impose any requirement* on any holder of a state franchise *except as expressly provided* in [DIVCA].²

Tellingly, none of the parties advocating additional reporting requirements even acknowledge this section of DIVCA.

¹ Pub. Util. Code § 5810(a)(1). All code references are to the Public Utilities Code, unless otherwise indicated.

² § 5840(a) (emphasis added).

As explained in AT&T's Opening Comments, the additional reporting requirements proposed in the PD would violate DIVCA's prohibition on the creation of new requirements.³ In addition, AT&T agrees with Verizon California, Inc. that the legislative history of DIVCA demonstrates the Legislature intentionally omitted subscriber reporting, and the Commission is not free to re-impose it.⁴ The even broader and more burdensome reporting advocated by TURN, CCTPG/LIF and Greenlining would only push the Proposed Decision further out of compliance with DIVCA.

II. DISCUSSION

Below, these reply comments address (A) additional reporting requirements proposed by TURN, CCTPG/LIF and Greenlining; (B) California Cable and Telecommunications Association ("CCTA") comments, and (C) continued requests for intervenor compensation.

A. Additional Reporting Requirements

CCTPG/LIF argue that the PD's (inaccurate) rationale for collecting subscriber data also supports "reporting on pricing by market or census tract,"⁵ thus demonstrating the slipperiness of the PD's slope. Greenlining similarly proposes reporting of "the cost of service by census tract" so that if low-income households are being "priced out" of the service, the Commission can "devise a solution."⁶ However, as the PD properly acknowledges, DIVCA expressly deprives the Commission of any authority over video pricing.⁷ Thus, in addition to violating DIVCA's ban on new requirements, the reporting of pricing data would burden franchise holders merely to generate data over which the Commission has no jurisdiction. Of course, CCTPG/LIF and

³ AT&T California, pp. 2-4.

⁴ Verizon, pp. 5-6.

⁵ CCTPG/LIF, p. 2.

⁶ Greenling, p. 4.

Greenlining are free to collect pricing data from public sources if they wish, but franchise holders should not be required, under penalty of non-compliance, to do the work for them.

Greenlining also proposes requiring franchise holders to report the “kind and quality of services available by census tract.”⁸ CCTPG/LIF argue for similar reporting *at the census block level* of (1) the “specific” broadband and video technologies used, or (2) the data transfer speed each technology delivers.⁹ For its part, TURN advocates reporting of the “types of technology to deliver broadband service and...reporting by speed,”¹⁰ including “upload and download speeds.”¹¹

CCTP/LIF and TURN argue these highly granular (there are 5,652 census *tracts*, and even more block groups, in AT&T’s franchise territory) and burdensome reporting requirements are justified by a *definition* used in DIVCA,¹² which defines “access” to include alternate technologies as long as they provide similar internet accessibility and video programming.¹³ However, this definition is actually intended to allow providers the *flexibility* to use alternate technologies with similar capabilities. Moreover, both DIVCA and General Order (“G.O.”) 169 only distinguish between “broadband” and non-broadband services—currently defining “broadband” to be speeds of more than 200 kilobits per second¹⁴—and require reporting of where

⁷ PD, p. 22; § 5820(c).

⁸ Greenlining, p. 5.

⁹ CCTPG/LIF, p. 3.

¹⁰ TURN, p. 2.

¹¹ *Id.* at 3. TURN argues the PD’s determination to require reporting “about use of wireless broadband by customers” supports these additional requirements, again demonstrating the PD’s slippery slope. *Id.*

¹² CCTPG/LIF, p. 3; TURN p. 3. CCTPG/LIF also argue these requirements are justified by certain findings and declarations of DIVCA (CCTPG/LIF, p. 4, citing § 5810), but does not explain how. To the contrary, where DIVCA intended to impose reporting requirements it plainly did so (see sections 5920 and 5960).

¹³ § 5890(j)(4).

¹⁴ G.O. 169, p. 1, fn. 2.

“broadband” is being provided.¹⁵ Thus, when franchise holders report on the number of households with access to “broadband,” they are indicating the number of households with speeds of 200 kilobits per second or greater. No further distinction is relevant under DIVCA.

CCTPG/LIF also argue that reporting the “specific” broadband and video technologies used would allow the Commission to better monitor whether franchise holders are complying with DIVCA’s fiber deployment requirements, citing section 5890(e).¹⁶ However, section 5890(e) simply imposes different build-out requirements depending on whether the franchise holder is “predominantly deploying fiber optic facilities to the customer’s premise,” it does not require fiber build-out. The Commission recently determined that the only reporting required in connection with 5890(e) is an indication on the franchise application of whether or not the franchise hold would predominantly deploy fiber to the customer’s premise.¹⁷

B. CCTA’s Comments

CCTA asserts that the relevant non-discrimination inquiry is whether the provider “failed to provide access to low income areas in the franchise...,”¹⁸ and argues there is no basis for gathering the number of video customers by census tract from certain incumbent cable providers. However, CCTA indicates there may be a “legitimate interest” in collecting this information from new entrants.¹⁹ CCTA’s comments merely attempt to create reporting requirements that would give incumbent cable providers a regulatory advantage, despite DIVCA’s intent to “[c]reate a fair and level playing field for all market competitors.”²⁰

¹⁵ § 5860(b); G.O. 169, pp. 15-16.

¹⁶ CCTPG/LIF, p. 4.

¹⁷ Resolution T-17107 (Sept. 6, 2007).

¹⁸ CCTA, p. 4.

¹⁹ *Id.* at 1-2.

²⁰ § 5810(a)(2)(A).

C. Intervenor Compensation

Finally, Greenlining and TURN reiterate their request that intervenor compensation be allowed in DIVCA proceedings.²¹ AT&T incorporates by reference its previous responses to this erroneous request.²²

III. CONCLUSION

As set forth above, and in AT&T California's Opening Comments, AT&T requests the Proposed Decision be revised to comply with DIVCA by not imposing any additional reporting requirements.

Respectfully submitted,

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²¹ Greenlining, p. 5; TURN, pp. 5-6 (incorporating its arguments by reference made (at 17-23) in its Application for Rehearing of D.07-03-014, filed April 4, 2007).

²² See Response of AT&T California to Applications for Rehearing, pp. 8-10 (Apr. 19, 2007); Reply Comments of AT&T California, pp. 8-10 (Nov. 1, 2006).

CERTIFICATE OF SERVICE

I, Agnes Ng, hereby certify that I have this day served a copy of the foregoing **REPLY
COMMENTS OF AT&T CALIFORNIA ON DRAFT OPINION RESOLVING ISSUES IN
PHASE II (FILED 8/24/07)** on all persons on the official service List in **R.06-10-005**, via e-mail, hand-delivery and/or first-class U.S. Mail.

Dated this 18th day of September 2007 at San Francisco, California.

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CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

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